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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

D.S., a minor by and through his
guardian ad litem Elsa Acosta,
individually and as successor-in-interest
to William Salgado; C.S., a minor by
and through his guardian ad litem Elsa
Acosta, individually and as successor-
in-interest to William Salgado; J.S., a
minor by and through her guardian ad
litem Elsa Acosta, individually and as
successor-in-interest to William
Salgado; M.S., a minor by and through
her guardian ad litem Elsa Acosta,
individually and as successor-in-interest
to William Salgado,

**Case No. 2:23-cv-09412-CBM-AGR
(Consolidated with Case No. 2:24-cv-
04898-CBM-AGR)**

*District Judge Consuelo B. Marshall
Magistrate Judge Alicia G. Rosenberg*

**STIPULATION AND JOINT
REQUEST FOR ORDER
CONTINUING PRETRIAL AND
TRIAL DATES**

*[Proposed Order filed concurrently
herewith]*

1 Plaintiffs,

2 v.

3 CITY OF HUNTINGTON PARK;
4 NICK NICHOLS; RENE REZA;
5 MATTHEW RINCON; APRIL
6 WHEELER; and DOES 5 through 10,
 inclusive,

7 Defendants.

8 WILLIAM OMAR CASTILLO
9 MIRANDA, an individual and as
10 Successor in Interest for Decedent,
11 WILLIAM RENE SALGADO
12 MIRANDA; JUANA MARIA
13 MIRANDA, an individual and as
14 Successor in Interest for Decedent,
15 WILLIAM RENE SALGADO
16 MIRANDA; OSMAR ANTONIO
17 CASTILLO BLANDON, a minor by
18 and through Guardian ad litem,
19 EUGENIA GUADELUPE ESPINOZA
20 SALMERON; EUGENIA
21 GUADELUPE ESPINOZA
22 SALMERON, an individual; KARLA
23 VANESSA BLANDON, an individual,

24 Plaintiffs,

25 v.

26 CITY OF HUNTINGTON PARK;
27 RENE REZA, an individual; APRIL
28 WHEELER, an individual; MATTHEW
 RINCON, an individual; NICK
 NICHOLS, an individual; JOSE A.
 YAMASAKI, an individual; SAUL
 RODRIGUEZ, an individual; and
 DOES 1 TO 10, inclusive,

 Defendants.

1 **TO THE HONORABLE COURT:**

2 IT IS HEREBY STIPULATED BY AND BETWEEN Plaintiffs D.S., C.S.,
3 J.S., and M.S. (“*Salgado* Plaintiffs”); Plaintiffs William Omar Castillo Miranda,
4 Juana Maria Miranda, Osmar Antonio Castillo Blandon, Eugenia Guadalupe
5 Espinoza Salmeron, and Karla Vanessa Blandon (“*Miranda* Plaintiffs”); and
6 Defendants City of Huntington Park, Rene Reza, April Wheeler, Matthew Rincon,
7 Nick Nichols, Jose A. Yamasaki, and Saul Rodriguez (“Defendants”)—the parties to
8 this action—for the purpose of jointly requesting that the honorable Court enter an
9 order, pursuant to Fed. R. Civ. P. 16(b)(4) and any applicable Orders of the Court,
10 continuing the upcoming pretrial dates and deadlines and trial date in this action,
11 based on the likelihood of settlement of these consolidated actions, as follows:

12 **GOOD CAUSE STATEMENT.**

- 13 1. WHEREAS, this is a wrongful death civil rights case involving the City of
14 Huntington Park Police Department. The *Salgado* Plaintiffs’ original
15 Complaint was filed against the City of Huntington Park and Doe defendants
16 on November 7, 2023. [Dkt. 1.] After that Complaint was filed, a First
17 Amended Complaint was filed on July 10, 2024, naming additional
18 defendants. [Dkt. 31-1.] All named defendants subsequently answered the
19 First Amended Complaint.
- 20 2. The Court issued an Order setting pretrial and trial dates and deadlines in the
21 *Salgado* action on April 30, 2024. [Dkt. 22.] Those dates and deadlines
22 included a Pre Trial Conference set for April 22, 2025, at 2:30 p.m., and a
23 Jury Trial set for May 27, 2025, at 10:00 a.m. [*Id.*]
- 24 3. The *Miranda* Plaintiffs’ original Complaint was filed on June 11, 2024. [No.
25 2:24-cv-04898-CBM-AGR, Dkt. 1.] After that Complaint was filed, a First
26 Amended Complaint was filed on July 29, 2024, naming additional
27 defendants. [No. 2:24-cv-04898-CBM-AGR, Dkt. 12.] All named defendants
28 subsequently answered the First Amended Complaint.

- 1 4. The Court issued an Order consolidating the *Salgado* and *Miranda* cases for
2 purposes of discovery and trial on September 3, 2024, under the *Salgado*
3 docket, No. 2:23-cv-09412-CBM-AGR. [Dkt. 38.]
- 4 5. A motion for summary judgment filed in the *Miranda* action was taken under
5 submission by the Court on March 26, 2025, and is currently pending a
6 decision by the Court. [No. 2:24-cv-04898-CBM-AGR, Dkt. 29.]
- 7 6. The parties to these consolidated actions participated in a mediation with
8 panel mediator Richard Copeland on April 3, 2025. As a result of that
9 mediation, Mr. Copeland has put forward a mediator's proposal to resolve
10 each of the consolidated actions. Defendants' consideration of that proposal
11 will require evaluation thereof by an excess insurance pool, which will be
12 considering the mediator's proposal on May 16, 2025. The parties believe that
13 there is a likelihood that the case will resolve following consideration of the
14 mediator's proposal.
- 15 7. The parties are working cooperatively with the mediator in good faith to
16 attempt to resolve these consolidated actions before trial and without
17 expending additional resources unnecessarily and without unnecessarily
18 taking the Court's time.
- 19 8. In order to allow the parties to further attempt to resolve these consolidated
20 actions prior to trial based on the mediator's proposal, and for the mediator's
21 proposal to be considered as scheduled on May 16, 2025, without the parties
22 first having to submit required pretrial documents to the Court or taking up
23 the Court's time with currently scheduled hearings, the parties are respectfully
24 requesting that the Court continue the currently scheduled Pre Trial
25 Conference, Jury Trial, and all pre-trial filing deadlines based on those dates
26 (under this Court's Local Rules) by approximately 30 days, as set forth
27 below.
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9. To further facilitate consideration of the mediator's proposal on May 16, 2025, the parties also respectfully request that the Court delay issuance of an order on the pending motion for summary judgment until after that date.

10. This is the first request by the parties for a continuance of the Pre Trial Conference and Jury Trial in this matter, and the fifth request for a continuance more generally.

STIPULATION RE CONTINUANCE OF SCHEDULING ORDER
DEADLINE.

11. Accordingly, in light of the foregoing Good Cause, the parties hereby stipulate and request an order delaying the Court's issuance of a ruling on the pending summary judgment motion until after May 16, 2025; continuing the Pre Trial Conference and Jury Trial as follows; and further ordering that all pre-trial filing deadlines shall be governed by the new Pre Trial Conference and Jury Trial dates:

EVENT	CURRENT DATE	REQUESTED DATE
Pre Trial Conference	04/22/2025 2:30 p.m.	5/27/2025 2:30 p.m.
Jury Trial	05/27/2025 10:00 a.m.	06/30/2025 10:00 a.m.

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1 **IT IS SO STIPULATED.**

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3 DATED: April 8, 2025

LAW OFFICES OF DALE K. GALIPO

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By: /s/ Benjamin S. Levine

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Dale K. Galipo

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Benjamin S. Levine¹

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*Attorneys for Plaintiffs D.S., C.S.,
J.S., and M.S.*

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10 DATED: April 8, 2025

CARRAZCO LAW, A.P.C.

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By: /s/ Kent M. Henderson

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Angel Carrazco, Jr.

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Kent M. Henderson

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Christopher L. Holm

16

Attorneys for Plaintiffs William Omar

17

Castillo Miranda, Juana Maria

Miranda, Osmar Antonio Castillo

Blandon, Eugenia Guadalupe Espinoza

Salmeron, and Karla Vanessa Blandon

18

19 DATED: April 8, 2025

ALVAREZ-GLASMAN & COLVIN

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By: /s/ Roger A. Colvin

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Roger A. Colvin

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Christy M. Garcia

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Attorneys for Defendants

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¹ Pursuant to Local Rule 5-4.3.4, as the filer of this document, I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.